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Washington, DC 20549

NYSE Regulation

NYSE Regulation, Inc. [20 Broad Street New York, New York 10005 nyseregulation.com

October 23, 2009



CENTPAC 001-32544

Ms. Velma Smith, Branch Chief Securities and Exchange Commission Division of Corporation Finance – Filer Support Office 100 F Street, N.W., Mail Stop 3040 Washington, D.C. 20549

Re: Citigroup Funding Inc.—Original Listing

CIK: 0001318281 Filer: 001-32544

Filing: 8-A12B filed October 22, 2009

Dear Ms. Smith:

Please be advised that NYSE Regulation, Inc. has received (on October 21, 2009) an application from the above-referenced issuer and has approved the following securities for listing on NYSE Arca, Inc. ("Exchange"):

Equity LinKed Securities (ELKS®) Based Upon the Common Stock of Schlumberger Limited Due 2010

The Exchange requests acceleration of registration of this security under the Securities Exchange Act of 1934. If there are any questions, please call me at (212) 656-4632. Your assistance is greatly appreciated.

Sincerely,

Clinton Clark

Analyst, Corporate Compliance